2500-FM-LRWM0278 Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 2-4-04
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR ☒ S Q GENERATOR

Company name Kane Magnetics International I.D. Number PAD043817444

Site Address 700 Elk Ave, Kane PA 16735

County McKean Municipality Kane Boro Zip 16735

Name of Inspector Jeffrey Threlfall

Name & Title of Responsible Official Ken Bush, Manager Environmental & Safety

Person Interviewed Ken Bush Telephone (814) 837-0248

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: _____ Pounds <1000 Kgs

1. **Site Characterization:**

   STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

   PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

   GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. **Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

   Universal Waste Types _____

3. **Hazardous Waste Transporters:**

   Transporter Name Safety Klean Systems License Number PA-AH 0172

   Transporter Name _____ License Number _____

   Transporter Name _____ License Number _____

4. **Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
F001-D001	Waste Flammable liquids	Safety Klean, Smithfield Ky Incinerate
D001-D039	Parts Cleaner	Safety Klean, Erie PA Reclaim

2500-FM-LRWM0276a Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Kane Magnetics International ID Number PAD043817444 Date 2-4-04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
	✓			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
✓				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
✓				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	✓			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
		✓		Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
		✓		Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
	✓			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	✓			Exception reporting procedures followed	262a.42	262.42	H016
	✓			Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	✓			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	✓			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

2500-FM-LRWM0276b Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Kane Magnetics International ID Number PAD043817444 Date 2-4-04

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
✓				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
✓				Containers of hazardous waste in good condition	265a.1	265.171	H026
✓				Containers and stored waste compatible	265a.1	265.172	H027
✓				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
✓				Containers managed to prevent leaks	265a.1	265.173(b)	H029
✓				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
✓				Container storage areas inspected at least weekly	265a.1	265.174	H031
✓				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
✓				Proper containment and collection systems in place	265a.179		H033
✓				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
✓				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
✓				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
✓				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 2-4-04 Identification Number PAD043817444

Company/Facility/Site Name Kane Magnetics International

All hazardous waste containers are now kept on the portable containment pads. Containers were properly labeled and dated. Storage area inspections are conducted and records of such are kept. Drums are color coded and a storage log is kept. Former violations have been corrected.

The oil/water separator area had a containment system built. System is walls about 8" tall and a grate over the entire area except where the tanks are coming up through. The walls are sealed to the floor.

Monitoring of the wastewater treatment has not yet showed the need for PBR treatment for high ph. The highest have been around 11. There is pretreatment prior to discharge to the Kane POTW

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Mailed Date

Inspector (signature) Jeffrey Thuffield Date 2-6-04

2500-FM-LRWM0276 Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 8-27-03
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR ☒ S Q GENERATOR

Company name Kane Magnetics International I.D. Number PAD043817444

Site Address 700 Elk Ave Kane PA

County McKean Municipality Kane Boro Zip 16735

Name of Inspector JeFFrey ThrelFall

Name & Title of Responsible Official Kenneth Bush, Manager Environment + Safety

Person Interviewed Kenneth Bush Telephone (814) 837-0248

Mailing Address (if different from above) _____

Amount of Hazardous Waste Generated per Month: _____ Pounds <1000 Kgs

1. **Site Characterization:**

   STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

   PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

   GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. **Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

   Universal Waste Types Fl lamps

3. **Hazardous Waste Transporters:**

   Transporter Name Safety Kleen Systems License Number PA AH-0172

   Transporter Name _____ License Number _____

   Transporter Name _____ License Number _____

4. **Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
F001-D001	Waste Flammable liquids	Safety Kleen - Smithfield Ky reclaim
D001-D039	Parts Cleaner	Safety Kleen, Erie PA reclaim

2500-FM-LRWM0276a Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Kane Magnetics International ID Number PAD043817444 Date 8-27-03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS				REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
1	2	3	4				
✓				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
✓				Identification Number	262a.10	262.12	H002
✓				Authorized transporters only	262a.10	262.12(c)	H003
✓				Subsequent notification requirements met	262a.12(b)		H004
✓				Proper manifest used	262a.10	262.21	H005
✓				Manifests filled out correctly and completely	262a.20		H006
✓				Manifests signed and routed properly	262a.23(a)	262.23	H007
	✓			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
✓				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
✓				SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	✓			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
✓				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
	✓			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
✓				Specified records retained for three years	262a.10	262.40(c)	H014
	✓			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
	✓			Exception reporting procedures followed	262a.42	262.42	H016
	✓			Spill reporting procedures followed	262a.10	262.34(d)	H017
✓				PPC plan developed and implemented	262a.10	262.34(a)	H018
	✓			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
	✓			Source reduction strategy prepared and available (LQG only)	262a.100		H020
	✓			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

2500-FM-LRWM0276b Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Kane Magnetics International ID Number PAD043817444 Date 8-27-03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS 1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			✓	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
✓				Containers of hazardous waste in good condition	265a.1	265.171	H026
✓				Containers and stored waste compatible	265a.1	265.172	H027
✓				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
✓				Containers managed to prevent leaks	265a.1	265.173(b)	H029
✓				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
			?	Container storage areas inspected at least weekly	265a.1	265.174	H031
✓				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
			✓	Proper containment and collection systems in place	265a.179		H033
?				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
			✓	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			✓	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
✓				Containers labeled accurately identify contents	SWMA 6018.403(b)(2)		H037

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 8-27-03 Identification Number PAD043817444

Company/Facility/Site Name Kane Magnetics International

Onsite with Jack Crow

Dropped off the Dept's Permit By Rule Notification Form for Wastewater Treatment in the Acid Leach Building. The wastewater being neutralized has a ph of 11 to 12. ph of 12.5 is considered hazardous and Permit By Rule regulations would need to be met. Company can decide which way to go with it, haz or non haz.

Parts wash material is handled directly by Safety Kleen

Other plant solvent/Paint Thinners is put in 55 gallon drums and handled by Safety Kleen. At the time of inspection oil Filters were being drained into a drum marked solvents and waste oil. This drum was not dated nor labeled "hazardous waste". Plant procedure is to keep these materials separate. Although the entire building where these drums are stored is said to be contained, the hazardous waste drums require a more restrictive containment system. The non haz. oil/water separator units should also have better containment. The container storage area should be inspected Weekly and records of such should be kept.

Please inform me when the container storage area is in compliance with the regs (within 15 days). A Follow up inspection will be conducted

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Mailed Date

Inspector (signature) Jeffrey Threlkeld Date 9-3-03

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
Interim Final 2/5/99
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)
Current Human Exposures Under Control

Facility Name: **Kane Magnetics International**
Facility Address: **700 Elk Avenue, Kane, PA 16735**
Facility EPA ID #: **PAD 04 381 7444**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X If yes - check here and continue with #2 below.

_____ If no - re-evaluate existing data, or

_____ If data are not available skip to #6 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	___	X	___	_____
Air (indoors)[2]	___	X	___	_____
Surface Soil (e.g., <2 ft)	___	X	___	_____
Surface Water	___	X	___	_____
Sediment	___	X	___	_____
Subsurf. Soil (e.g., >2 ft)	___	X	___	_____
Air (outdoors)	___	X	___	_____

X If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

_____ If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

_____ If unknown (for any media) - skip to #6 and enter "IN" status code.

Rationale and Reference(s): Reference letter from Thompson, Hine and Flory, LLP, signed by Stephen J. Axtell, dated November 2, 1999, to Mr. Jeffery R. Hendel, US Army Corps of Engineers.

Kane has concluded that available relevant/significant information on known and reasonably suspected releases subject to RCRA Corrective Action has been considered. Kane further asserts that there are no known or suspected releases subject to corrective action.

Most, if not all structures are on bedrock, or within a few feet of bedrock. There is no known shallow aquifer in the vicinity. Much of the site is paved and areas which support vegetation do not receive extensive human use.

Footnotes:

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

	Potential **Human Receptors** (Under Current Conditions)						
"Contaminated" Media	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food[3]
Groundwater	No	No	No	No	No	No	No
Air (indoors)	___	___	___				
Soil (surface, e.g., <2 ft)	No	No	No	No	No	No	No
Surface Water	___	___			___	___	___
Sediment	___	___			___	___	___
Soil (subsurface e.g., >2 ft)	No	No	No	No	No	No	No
Air (outdoors)	___	___	___	___	___		

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated") as identified in #2 above.
2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

_____ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any "Contaminated" Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter "IN" status code

Rationale and Reference(s):_____

[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

   _____ If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

   _____ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

   Rationale and Reference(s):_____

[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

_____ If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):_____

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the **Kane Magnetics International** facility, EPA ID # **PAD 04 381 7444**, located at **Kane, PA** under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

____ NO - "Current Human Exposures" are NOT "Under Control."

____ IN - More information is needed to make a determination.

Completed by (signature) /Hon Lee /s/ Date: 09-27-00
(print) Hon Lee
(title) Remedial Project Manager

Supervisor (signature) /Paul Gotthold /s/ Date: 09-27-00
(print) Paul Gotthold
(title) PA Operations Branch Chief
(EPA Region or State) EPA, Region 3

Locations where References may be found:

US EPA Region III, 3WC22, 1650 Arch Street, Philadelphia, PA 19103
EPA Administrative Records - Environmental Indicator Inspection Report for Kane Magnetics International, Kane, PA (EPA ID No. PAD 043 817 444)

Contact telephone and e-mail numbers:

(name) Hon Lee
(phone #) 215-814-3419
(e-mail) lee.hon@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION
Interim Final 2/5/99
RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA750)
Migration of Contaminated Groundwater Under Control

Facility Name: **Kane Magnetics International**
Facility Address: **700 Elk Avenue, Kane, PA 16735**
Facility EPA ID #: **PAD 04 381 7444**

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

   X If yes - check here and continue with #2 below.

   _____ If no - re-evaluate existing data, or

   _____ If data are not available, skip to #8 and enter"IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Is **groundwater** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

_____ If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

X If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): Reference letter from Thompson Hine and Flory, LLP, signed by Stephen J. Axtell, dated November 2, 1999, to Mr. Jeffery R. Hendel, US Army Corps of Engineers.

Kane has concluded that all available relevant/significant information on known and reasonably suspected releases subject to RCRA Corrective Action has been considered. Kane further asserts that there are no known or suspected releases subject to corrective action.

Most, if not all structures are bedrock, or within a few feet of bedrock. There is no known shallow aquifer in the vicinity. Much of the site is paved and areas which support vegetation do not receive extensive human use.

Footnotes:

[1]"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"[2] as defined by the monitoring locations designated at the time of this determination)?

_____ If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"[2]).

_____ If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"[2]) - skip to #8 and enter "NO" status code, after providing an explanation.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):_____

[2] "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

_____ If yes - continue after identifying potentially affected surface water bodies.

_____ If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):_____

5. Is the **discharge** of "contaminated" groundwater into surface water likely to be **"insignificant"** (i.e., the maximum concentration[3] of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration[3] of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration[3] of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations[3] greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):_____

[3] As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

6. Can the **discharge** of "contaminated" groundwater into surface water be shown to be "**currently acceptable**" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented[4])?

_____ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,[5] appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

_____ If no - (the discharge of "contaminated" groundwater can not be shown to be "**currently acceptable**") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s):_____

[4] Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

[5] The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

_____ If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

_____ If no - enter "NO" status code in #8.

_____ If unknown - enter "IN" status code in #8.

Rationale and Reference(s):_____

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

X YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the **Kane Magnetics International** facility, EPA ID # **PAD 04 381 7444**, located at **Kane, PA.** Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

_____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

_____ IN - More information is needed to make a determination.

Completed by (signature) /s/ /Hon Lee Date: 09-27-00
(print) Hon Lee
(title) Remedial Project Manager

Supervisor (signature) /s/ /Paul Gotthold Date: 09-27-00
(print) Paul Gotthold
(title) PA Operations Branch Chief
(EPA Region or State) EPA, Region 3

Locations where References may be found:

US EPA Region III, 3WC22, 1650 Arch Street, Philadelphia, PA 19103.
EPA Administrative Records - Environmental Indicator Inspection Report for Kane Magnetics International, Kane, PA (EPA ID No. PAD 043 817 444).

Contact telephone and e-mail numbers:

(name) Hon Lee
(phone #) 215-814-3419
(e-mail) lee.hon@epa.gov

2500-FM-LRWM0276 Rev. 5/99

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 8-25-99
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☐ GENERATOR ☒ S Q GENERATOR

Company name Kane Magnetics International I.D. Number PAD043817444
Site Address 700 Elk Ave. Kane PA 16735
County McKean Municipality Kane Boro Zip 16735
Name of Inspector Jeffrey Threlfall
Name & Title of Responsible Official Kenneth Bush, Manager Environmental & Safety
Person Interviewed Ken Bush Telephone (814) 837-7000
Mailing Address (if different from above) _____
Amount of Hazardous Waste Generated per Month: _____ Pounds < 1000 Kgs

1. **Site Characterization:**

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☒ Neutralization/WWTP ☐ Reclaim Other _____
GENERATOR TREATMENT ☐ Containers ☒ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. **Universal Waste:** ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. **Hazardous Waste Transporters:**

Transporter Name _____ License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. **Types of hazardous waste generated and destination facility (location & type).**

Waste Code	Waste Description	Destination Facility
F001-D039	Waste Solvents	Safety-Kleen
D002 (Not counted)	Elementary Neutralization	Kane POTW

ER-WM-129: Rev. 12/93

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 8-25-99 Identification Number PAD043817444

Company/Facility/Site Name Kane Magnetics International

Onsite with EPA's Hon Lee & US Corps of Engineers reps Jeff Hendel and William Harris. Toured plant processes and all waste units.

Kane Magnetics International currently is a small quantity generator of waste solvents. A corrosive waste water is also generated but is neutralized onsite (elementary Neutralization) and thus does not count towards the hazardous waste quantity. A new EPA Notification has not been submitted yet. In the past KMI has met the states Permit By Rule requirements and will need to continue to. These requirements are in the May 1, 1999 Pennsylvania Bulletin (Volume 29, Number 18, Part II). Part of these requirements is that the Dept. be notified of PBR activity, a form for such is enclosed. The neutralized waste water should be included on the next Residual Waste Biennial Report since it is not being counted on the hazardous waste reports.

A change in magnet making raw materials in 1997 eliminated hazardous wastes for barium (D005) & lead (D008).

An updated PPC Plan and Training Plan was provided at the inspection

No Violations noted

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Mailed Date

Inspector (signature) Jeffrey Thielfall Date 9-8-99

KANE magnetics INTERNATIONAL
700 Elk Avenue
Kane, PA 16735
Tel: 814/ 837 7000
Fax: 814/ 837 9635

April 11, 1997

U.S. EPA Region III
RCRA Programs Bureau
Pennsylvania Section (3HW51)
841 Chestnut Street
Philadelphia, PA. 19107

RE: Transfer of Regulation Waste Activity I.D. Number

Dear Sir

We hereby advise you that on or about April 11, 1997 Stackpole Magnetic Systems, Inc. - Kane Facility EPA I.D. Number PAD043817444 will change our operating name to Kane Magnetics International.

Please Transfer the Regulated Waste Activity I.D. Number, per attached form.

The plant will be operated with no major changes in operations that will affect this registration.

Please call me if you have any questions at (814) 837-7000.

Very truly yours,

KANE MAGNETICS INTERNATIONAL

Kenneth H. Bush
Corporate Director of Environmental, Safety and Energy Affairs

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 9-30-96
GSA No. 0246-EPA-OT

Please refer to the *Instructions for Filling Notification* before completing this form. The information requested here is required by law (Section 3010 of the *Resource Conservation and Recovery Act*).

EPA Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received (For Official Use Only)

I. Installation's EPA ID Number *(Mark 'X' in the appropriate box)*

☐ A. First Notification ☐ B. Subsequent Notification *(Complete item C)*

C. Installation's EPA ID Number: PAD043817444

II. Name of Installation *(Include company and specific site name)*

KANE MAGNETICS INTERNATIONAL

III. Location of Installation *(Physical address not P.O. Box or Route Number)*

Street: 700 ELK AVENUE

Street *(Continued)*:

City or Town: KANE | State: PA | Zip Code: 16735-

County Code: | County Name: McKEAN

IV. Installation Mailing Address *(See Instructions)*

Street or P.O. Box: SAME

City or Town: | State: | Zip Code: -

V. Installation Contact *(Person to be contacted regarding waste activities at site)*

Name *(Last)*: BUSH | *(First)*: KENNETH H

Job Title: Corp. Director Env. Safety, Energy Affairs | Phone Number *(Area Code and Number)*: 814-837-7000

VI. Installation Contact Address *(See Instructions)*

A. Contract Address Location: X | Mailing: | Other:

B. Street or P.O. Box: 700 ELK AVENUE

City or Town: KANE | State: PA | Zip Code: 16735-

VII. Ownership *(See Instructions)*

A. Name of installation's Legal Owner: KANE MAGNETICS INTERNATIONAL

Street, P.O. Box, of Route Number: 700 ELK AVENUE

City or Town: KANE | State: PA | Zip Code: 16735-

Phone Number *(Area Code and Number)*: 814-837-7000 | B. Land Type: P | C. Owner Type: P | D. Change of Owner Indicator: Yes ☐ No X | (Date Changed) Month: 04 Day: 11 Year: 97

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0028 Expires 9-30-96
GSA No. 0246-EPA-OT

ID - For Official Use Only

VIII. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes; Refer to Instructions)*

A. Hazardous Waste Activity

1. Generator (See Instructions)
- [X] a. Greater than 1000kg/mo (2,200 lbs.)
- [ ] b. 100 to 1000 kg/mo (200-2,200 lbs.)
- [ ] c. Less than 100 kg/mo (220 lbs)

2. Transporter (Indicate Mode in boxes 1-5 below)
- [ ] a. For own waste only
- [ ] b. For commercial purposes

Mode of Transportation
- [ ] 1. Air
- [ ] 2. Rail
- [ ] 3. Highway
- [ ] 4. Water
- [ ] *5. Other - specify*

[ ] 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.

4. Hazardous Waste Fuel
- [ ] a. Generator Marketing to Burner
- [ ] b. Other Marketers
- [ ] c. Boiler and/or Industrial Furnace
  - [ ] 1. Smelter Deferral
  - [ ] 2. Small Quantity Exemption

Indicate Type of Combustion Device(s)
- [ ] 1. Utility Boiler
- [ ] 2. Industrial Boiler
- [ ] 3. Industrial Furnace

[ ] 5. Underground Injection Control

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
- [ ] a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
- [ ] b. Marketer Who First Claims the Used Oil Meets the Specifications

2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
- [ ] a. Utility Boiler
- [ ] b. Industrial Boiler
- [ ] c. Industrial Furnace

3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
- [ ] a. Transporter
- [ ] b. Transfer Facility

4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
- [ ] a. Process
- [ ] b. Re-refine

IX. Description of Hazardous Wastes *(Use additional sheets if necessary)*

A. Characteristics of Nonlisted Hazardous Wastes. *(Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)*

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic	(List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
			X	D005, D008, D039

B. Listed Hazardous Wastes. *(See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)*

1	2	3	4	5	6
F001					
7	**8**	**9**	**10**	**11**	**12**

C. Other Wastes. *(State or other wastes requiring a handler to have an I.D. number; See Instructions.)*

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	Name and Official Title *(Type or print)*	Date Signed
[signature]	Chris C. Tyler President, Chief Executive Officer	4/11/97

XI. Comments

OFN: Stackpole Magnetic Sys Inc

BAH/CZ 4/16/97

Note: Mail completed form to the appropriate EPA Regional or State Office. *(See Section III of the booklet for addresses.)*

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

OFN: Stackpole Magnetic Systems
SQG
Name A'd

12/24/97

NUMBER

PAD[illegible]17[illegible] 05/22/97

ADDRESS

KANE MAGNETIC INDL
700 BLK AVE
KANE , PA 16735
KENNETH H PUSH DIR ENV SFTY &N

701 BLK AVE
KANE ,PA 16735

EPA Form 8700-12A (6-90)